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PRACTICE LIMITED TO MATTERS BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

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February 3, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: Formal Comments of Hampton County Broadcasters, Inc.
MM Docket No. MM Docket No. 96-250 -- RM-8952

Dear Mr. Caton:

Transmitted herewith, on behalf of Hampton County Broadcasters, Inc., through counsel, is an original and six (6) copies of "Formal Comments" in the above-captioned Rule Making Proceeding.

Should any questions arise concerning this matter, kindly contact the undersigned, directly.

Respectfully submitted,

By: Richard J. Hayes, Jr.
Richard J. Hayes, Jr., Esquire
Counsel to: Hampton County Broadcasters, Inc.

RJH:tb
Enclosures

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON DC 20554**

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)	
Amendment of Section 73.202(b))	MM Docket No. 96-250
Table of Allotments)	RM-8952
FM Broadcast Stations)	
(Parris Island and Hampton, South Carolina))	

TO: Chief, Allocations Branch

FORMAL COMMENTS OF HAMPTON COUNTY BROADCASTERS, INC.

Comes Now, Hampton County Broadcasters, Inc. , though counsel, with " Formal Comments" in the above-captioned proceeding.

Hampton County Broadcasters, Inc. is the licensee of FM broadcast station WBHC, Hampton, South Carolina. In a Notice of Proposed Rule Making (MM Docket No. 96-250, RM-8952) released by the Federal Communications Commission on December 13, 1996, a proposal was advanced which would amend the FM Table of Allotments by substituting Channel 276C3 for Channel 221A at Parris, South Carolina in order to modify the license of station WLWS-FM to specify operation on the higher-class channel. To accommodate the upgrade of WLWS-FM, it was also proposed that station WBHC-FM's license be modified to specify that WBHC-FM operate on Channel 221A at Hampton, South Carolina.

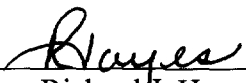
In that Notice of Proposed Rule Making, the Commission noted that the petitioner asserted that the proposed upgrade of WLWS-FM would serve the public interest by allowing WLWS-FM to operate as a wide-area FM station which would result in service to 43% more people and 52% greater area than presently served. Since WBHC-FM, Hampton, South Carolina presently operates as a 3,000 watt Class "A" facility, WBHC-FM would, as a result of the proposed channel swap, be able to operate at a full 6,000 watts thereby increasing the area served by 67% and population covered by 73%. The Petitioner's Request for Rule Making was predicated by the fact that the public interest would be

served by allowing WLWS-FM to become a wide-area station and by the fact that WBHC-FM would be able to operate at a full 6,000 watts on channel 221A. The Petitioner, furthermore, has made a commitment to the Commission, as required by the Rules, to reimburse WBHC-FM for the costs it will incur in making the required change in channels if this Notice of Proposed Rule Making is adopted.

In order to induce station WBHC-FM to cooperate with its proposal for an upgrade, WLWS-FM has committed that it will provide a used transmitter and an antenna as well as other associated electronic equipment to WBHC-FM in order to facilitate its operation as a full 6,000 watt facility. WBHC-FM relies on this commitment from WLWS-FM and has decided, as a result of the promises made by WLWS-FM, not to seek an upgrade of its own which would be mutually exclusive with the proposal of WLWS-FM. Additionally, WBHC-FM will still expect full reimbursement of all of the costs associated with its change in channels to 221A and will present WLWS-FM with an itemized list of those expenses for full payment prior to relocating to channel 221A. If these commitments are honored, WBHC-FM will interpose no objection to the upgrade of WLWS-FM and the relocation of WBHC-FM to channel 221A.

Respectfully submitted,

Hampton County Broadcasters, Inc.

By: 
Richard J. Hayes, Jr., Esquire
Its Attorney

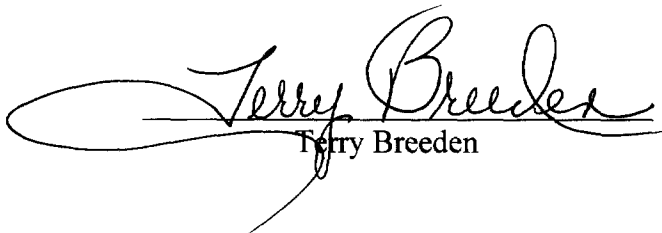
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Certificate of Service

I Terry Breeden, assistant to Richard J. Hayes, Jr., hereby declare that I have caused a copy of this pleading "Comments of Hampton County Broadcasters, Inc." to be sent, via first-class US mail, postage prepaid on this 3rd day of February, 1997, to the following:

Michelle A. McClure
Irwin, Campbell & Tannenwald, PC
1730 Rhode Island Avenue NW - Suite 200
Washington DC 20036
(Counsel to Petitioner)


Terry Breeden